

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Appendix A

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**STIPULATION AND ORDER
RELEASING AND DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO TRIBAL SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Tribal Plaintiffs identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and Defendants Teva and Anda, Inc. (collectively and together with their Released Entities, the “Settling Defendants”¹) that, pursuant to the election of each Dismissing Plaintiff to participate in the Teva Tribal Settlement Agreement, which is now dated December 19, 2022, which is binding on the Dismissing Plaintiffs and the Settling Defendants, and which has an Effective Date of February 24, 2023 (a copy of which is attached as Appendix B), all Claims of each Dismissing Plaintiff against any Settling Defendants, including any entity identified on the attached Appendix C, are hereby voluntarily released and **DISMISSED WITH PREJUDICE**, with each

¹ All capitalized terms not defined herein shall have the meaning set forth in the Teva Tribal Settlement Agreement. The Released Entities are each and every entity of any of the Settling Defendants that is a “Released Entity” as set forth in Section I.30 and Exhibit E of the Teva Tribal Settlement Agreement, dated as of December 19, 2022, a copy of which is attached as Appendix B. Appendix C, also attached hereto, represents a good faith effort by the Settling Defendants to list all Released Entities that may be individually named in any of the Dismissing Plaintiffs’ complaints. Appendix C is not intended to limit the scope of Released Entities, and to the extent that Dismissing Plaintiffs or Settling Defendants subsequently identify any Released Entity that should have been included on Appendix C, they will inform the Clerk of the Court.

party to bear its own costs. The Court shall retain jurisdiction with respect to the Teva Tribal Settlement Agreement to the extent provided under that Agreement.

Dated February 24, 2023

Respectfully Submitted,

Agreed as to form and substance:

/s/ Lloyd Miller

Lloyd Miller / Don Simon / Whitney Leonard
Sonosky, Chambers, Sachse, Miller & Monkman, LLP

/s/ Geoffrey Strommer

Geoffrey Strommer / Caroline Mayhew /
Edmund Goodman
Hobbs, Straus, Dean & Walker, LLP

/s/ Tim Purdon

Tara Sutton / Tim Purdon
Robins Kaplan LLP

/s/ Lynn Sarko

Lynn Sarko
Keller Rohrbach L.L.P.

/s/ T. Roe Frazer

T. Roe Frazer
Frazer PLC

/s/ Peter Mougey

Peter Mougey
Levin Papantonio Rafferty

/s/ Scott Gilbert

Scott Gilbert
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/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser / Dan Drachler / Eric B.
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/s/ Steve Skikos

Jane Joseph / Steve Skikos
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TEVA DEFENDANTS

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Counsel for Settling Defendants

SO ORDERED:

Dated: _____

HON. DAN AARON POLSTER
U.S. DISTRICT JUDGE